

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
matt.moran@vermont.gov

July 19, 2017

Trevor Allard – *via e-mail*
Allard Lumber Company
354 Old Ferry
Brattleboro, VT 05301

RE: Site Management Activity Completed
Former Vantem Panels Property, SMS Site #2013-4372
74 Glen Orne Drive, Brattleboro, VT
SPAN #: 08102515702

Dear Mr. Allard:

The Sites Management Section (SMS) has received the requested disposal documentation for the waste generated during the February 2013 *Aboveground Storage Tank (AST) Assessment* completed by Environmental Compliance Services, Inc. (ECS) on behalf of the owner of the property at the time, Vantem Panels. The SMS has completed a review of the site file and has the following understanding of the site:

- In February 2013, a small hole was discovered in a 275-gallon AST that served off-road, dyed diesel fuel to equipment inside the facility. Black and orange staining was observed on the concrete building foundation adjacent to the AST and on the ground beneath.
- Following removal of the AST, ECS and a subcontractor removed a 10 by 3 foot area of surface soils and proceeded to excavate down to 4 feet below grade in an effort to remove soils contaminated by the leaking AST. Soil samples collected from the sidewalls and bottom of the excavation indicated the vertical extent of the release was not defined. A photo-ionization detector (PID) was utilized to screen soils for total organic vapors (TOVs). ECS reported PID readings ranging from 14.3 to 18.7 parts per million (ppm) in soils screened from the sidewalls of the excavation and a reading of 233.4 ppm at the bottom of the excavation. ECS collected soil samples for laboratory analysis of volatile organic compounds (VOCs) and Total Petroleum Hydrocarbons (TPH). Two samples were collected from the sidewalls and one sample from the bottom of the excavation. For VOCs, all three samples had concentrations of VOCs greater than the laboratory detection limits, however all of the concentrations reported were less than the EPA regional screening values for industrial soils. TPH was reported at 159 mg/kg in the east sidewall, 1,390 mg/kg in the excavation bottom, and 1,780 mg/kg in the west sidewall. ECS indicated that further excavation of contaminated soils could possibly impact the building's foundation. Four drums of petroleum-contaminated soils were generated and stored onsite following completion of the excavation work.
- In an effort to bring closure to this matter, the SMS sent a January 19, 2017 letter to Vantem Panels requesting disposal documentation of the four waste drums. The letter also indicated that due to the potential impacts on the building's foundation, further investigation would not be required so long as a Notice is filed to the Town of Brattleboro's Land Records indicating the presence of at-depth petroleum contamination.

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- On April 4, 2017, the Allard Lumber Company (current owner of the property) provided disposal documentation for the four drums of waste generated during the 2013 excavation of contaminated soils.
- The site is an industrial property served by public water and sanitary sewer services provided by the Town of Brattleboro. The Connecticut River is located approximately 1,000 feet to the East of the site. The site is adjacent to a Class 4 Groundwater Classification for the Windham Solid Waste District Landfill.

Based on the above, our program has determined that the release of diesel fuel associated with the former AST and the presence of residual petroleum contaminated soil at-depth in the subsurface does not constitute an unacceptable exposure to human health and the environment under current use and conditions. Therefore, the SMS is assigning the property a Site Management Activity Completed (SMAC) designation.

This SMAC designation does not release the owner and/or operators (past, current, or future) from any past or future environmental liability associated with residual contamination from the identified release(s) or from any contamination discovered after the property receives this designation. It also does not mean that this property is free of contamination or absent of other environmental issues. However, this designation does mean that the SMS is not requesting any additional work related to the identified release at this time.

This SMAC letter and attached site plan shall be entered into the Town of Brattleboro land records to document that residual contamination from the diesel AST remains in subsurface soils at the property. Our program must be notified if future work disturbs the area of residual petroleum contamination. Any “intrusive” work in the area may require an approved corrective action or soil management plan from our program. **This SMAC letter and map shall be recorded in the Town Land Record for this property. The SMAC designation will be finalized once recording is complete and copies of all recorded documentation is provided to the SMS, including a copy of the notice with Town Clerk recording stamp with book and page number.**

If you have any questions, please do not hesitate to contact me or Michael Nahmias, the project manager, at 802-828-1138.

Sincerely,



Matt Moran, Environmental Program Manager
Sites Management Section

Attachment – site plan

cc: DEC Regional Office – *via e-mail*
Brattleboro Town Manager – *via e-mail*
Brattleboro Town Health Officer – *via e-mail*
Alicia Flammia, ATC Group Services (formerly ECS) – *via e-mail*